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REDACTED FOR PUBLIC INSPECTION

October 1, 2018

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Room TW-B204
Washington, DC 20554

Re: *Securus Technologies Inc. and Inmate Calling Solutions, LLC,
Consolidated Applications for Consent to the Transfer of Control of
Licenses and Authorizations, WC Docket No. 18-193*

Dear Ms. Dortch:

Inmate Calling Solutions, LLC d/b/a ICSolutions (“ICS”) submits its production of documents responsive to the Wireline Competition Bureau’s Information and Document request (“Information Request”) dated September 11, 2018 in connection with the above-referenced transaction and in accordance with the Protective Order in this docket (the “Document Production”).¹ Because ICS is producing materials that contain information that meets the requirements for treatment as “Confidential” or “Highly Confidential,” ICS is filing these documents pursuant to the staff’s instructions and the procedures established in the Protective Order and in the Information Request.²

¹ *Securus Technologies Inc., and Inmate Calling Solutions, LLC, Consolidated Applications for Consent to the Transfer of Control of Licenses and Authorizations*, Protective Order, WC Docket No. 18-193, DA No. 18-938 (rel. Sept. 11, 2018) (“Protective Order”).

² Consistent with the Protective Order, *id.* at ¶ 3, ICS obtained written approval from Commission staff to designate certain material as Highly Confidential. Pursuant to discussions with staff, the provided documents, unless specifically reviewed and downgraded, have been classified as “Highly Confidential.” Notwithstanding this default classification, ICS is not asserting Highly Confidential status for any

Marlene H. Dortch
October 1, 2018
Page 2

Enclosed please find three hard drives and one disc containing the load files and production indices associated with this production of documents, tagged as "Highly Confidential." A production index also is attached, tagged as "Highly Confidential." In addition, two copies of the filing are being delivered to the WCB staff (not including the hard drives or discs). One copy of the hard drives and disc is being delivered to the FCC's e-Discovery vendor. A redacted copy of this submission also is being filed electronically through the Commission's Electronic Comment Filing System.

Pursuant to discussions with Commission staff, documents responsive to Information Request specifications for "all documents" or similar language are being provided as part of the Document Production. The Document Production comprises the custodial documents provided to the Department of Justice ("DOJ") under the Second Request. ICS will provide all non-privileged custodial documents that were identified as responsive to the Second Request. ICS has reviewed the Information Request specifications requesting "all documents" or similar phrasing and believes that the documents responsive to those specifications are within the Second Request documents being provided to the DOJ, as limited by the relevant custodians agreed to with the DOJ. The enclosed hard drives include the vast majority of the Document Production, and ICS anticipates that any remaining documents (including a privilege log) will be provided by October 15, 2018.

ICS has made diligent efforts to ensure that none of the material it is submitting herewith is privileged under the attorney-client privilege or attorney work product doctrine. To the extent that any privileged materials may have been inadvertently produced, such production does not constitute a waiver of any applicable privilege. ICS requests that any privileged materials inadvertently produced be returned to ICS as soon as such inadvertent production is discovered by any party, and reserves all rights to seek return of any such documents.

If you have any questions arise concerning this submission, please contact the undersigned.

Very truly yours,



Howard M. Liberman
Counsel to Inmate Calling Solutions, LLC
d/b/a ICSolutions

Enclosures

documents that have been publicly released (which would be Public) or for third party materials that are copyrighted (which would be considered Confidential).

REDACTED

Production Index

REDACTED

Hard Drives and CDs